

July 2, 2012

United States District Court
Eastern District of New York
Honorable Nicholas G. Garaufis
225 Cadman Plaza East
Brooklyn, New York 11201

Re: U.S. v. Conrad Ianiello, et al
12 Cr. 264(NGG)

Dear Judge Garaufis:

I am writing regarding my client, Mr. James Bernardone. I am respectfully requesting that my client be permitted to travel from July 4 through July 12. Mr. Bernardone would be staying in a private home located in Boltons Landing, New York with his childhood friend Mr. Mark Sabarese. The home is located at 27 Deer Creek Road, Diamond Point, New York 12824.

I have spoken to Mr. Bernardone's pre-trial officer, Ms. Bianca C. Carter, and she has no objection to this request. Assistant United States Attorney Amanda Hector also does not object to this request.

If your Honor needs any further information to arrive at a decision regarding this request, please do not hesitate to contact my office.

Very truly yours,

Lawrence DiGiansante